

1 James L. Day, WSBA #20474
2 Thomas A. Buford, WSBA #52969
3 Bush Kornfeld LLP
4 601 Union Street, Suite 5000
5 Seattle, WA 98101-2373
6 Telephone: (206) 292-2110
7 Facsimile: (206) 292-2104
8 jday@bskd.com
9 tbuford@bskd.com

10 Narendra Ganti, Trust Administrator
11 of the Kennewick Liquidation Trust

12 HONORABLE FREDERICK P. CORBIT
13 Chapter 9

14 HEARING DATE: THURS., MARCH 7, 2019
15 HEARING TIME: 2:00 P.M.
16 LOCATION: 904 W. RIVERSIDE, 3RD FLOOR
17 RESPONSE DATE: THURS., FEBRUARY 28, 2019

18 UNITED STATES BANKRUPTCY COURT
19 EASTERN DISTRICT OF WASHINGTON

20 In re

21 KENNEWICK PUBLIC HOSPITAL
22 DISTRICT,

23 Debtor.

24 No. 17-2025

25 OMNIBUS OBJECTION TO
26 CLAIMS AND NOTICE OF
27 HEARING

28 TO:

29 ABILITY NETWORK
30 AGILENT TECHNOLOGIES, INC.
31 ALATTAR, FADI
32 COFFEY COMMUNICATIONS
33 DEPUY ORTHOPAEDICS, INC.
34 DEPUY SPINE – JOHNSON & JOHNSON
35 DEPUY SYTHES SALESS, INC.
36 FEDEX CORPORATE SERVICES, INC.
37 MANSOUR, MOUHAMAD
38 MANSOUR, MOUHAMAD
39 ORTHOFIX INC.
40 PSS UROLOGY, INC.
41 SEIU 1199NW HEALTHCARE
42 TRYON CLEAR VIEW GROUP, LLC

43 AND TO:

44 THE CLERK OF THE COURT

45 AND TO:

46 THE HONORABLE FREDERICK P. CORBIT

47 HEARING DATE:

48 THURSDAY MARCH 7, 2019

49 HEARING TIME:

50 2:00 P.M.

51 RESPONSE DUE:

52 THURSDAY, FEBRUARY 28, 2019

53 OMNIBUS OBJECTION TO CLAIM AND NOTICE OF
54 HEARING – Page 1

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56 LAW OFFICES
57 601 Union St., Suite 5000
58 Seattle, Washington 98101-2373
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60 Facsimile (206) 292-2104

LOCATION: 904 W. RIVERSIDE AVENUE, 3RD FLOOR COURTROOM,
SPOKANE, WASHINGTON 99201

Narendra Ganti, solely in his capacity as the Trust Administrator of the Kennewick Liquidation Trust, has filed an objection to your claim in this bankruptcy case.

Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one.

If you do not want the court to eliminate or change your claim, then you or your attorney must file with the Court and or before February 28, 2019 a written response to the objection, explaining your position.

If your written response is mailed to the court for filing, you must mail it early enough so that the court will receive it on or before the date stated above; mail to the following address:

U.S. Bankruptcy Court Clerk, Room 304, 904 W. Riverside Avenue, Spokane,
WA 99201.

The above-named creditor/claimant's claim(s) is objected to upon the grounds indicated below:

OBJECTION TO CLAIM

Narendra Ganti, solely in his capacity as the Trust Administrator of the Kennewick Liquidation Trust objects to claims as detailed below and states:

1. Mr. Ganti files this objection pursuant to Fed. R. Bankr. P. 3007.
2. On July 27, 2017, the Court entered an order at Docket Entry No. 104, which established December 27, 2017, as the final date by which creditors must file general unsecured claims.
3. On June 20, 2018, the Court entered an order at Docket Entry No 981, which confirmed the Debtor's Fourth Amended Plan. On Page 31 of the Court's order, the Court established that a claim for damages related to a rejection of an executory contract must be filed on or before thirty days after the effective date of the plan. On

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LAW OFFICES
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1 August 3, 2018, the Debtor filed a notice that the plan became effective on that date.
2 Docket Entry No. 1,023. Therefore, a claim for damages related to a rejection of an
3 executory contract was required to be filed on or before September 2, 2018.

4 3. Mr. Ganti objects to the following claims on the following grounds:

5 Claimant	6 Basis for Claim	7 Amount of 8 Claim	9 Basis for Objection
10 Ability Network	11 Proof of Claim No. 228	12 \$1,536.00	13 Untimely. Claim 14 filed on January 8, 15 2018.
16 Agilent 17 Technologies, Inc.	18 Proof of Claim No. 229	19 \$22,382.36	20 Untimely. Claim 21 filed on January 30, 22 2018.
23 Alattar, Fadi	24 Proof of Claim No. 170	25 Unknown	26 This claim has been 27 satisfied during the 28 course of this case.
29 Coffey 30 Communications	31 Proof of Claim No. 242	32 \$15,000.00	33 Untimely lease 34 rejection claim. 35 Claim filed 36 October 12, 2018.
37 DePuy 38 Orthopaedics, Inc.	39 Listed by the Debtor (Docket Entry No. 93, 40 Page 12)	41 \$396,094.60	42 Duplicated by 43 Claim Number 202
44 DePuy Spine – 45 Johnson & Johnson	46 Listed by the Debtor (Docket Entry No. 93, 47 Page 12)	48 \$71,886.75	49 Duplicated by 50 Claim Number 202
51 DePuy Sythes 52 Saless, Inc.	53 Listed by the Debtor (Docket Entry No. 93, 54 Page 12)	55 \$113,406.31	56 Duplicated by 57 Claim Number 202
58 FedEx Corporate 59 Services, Inc.	60 Proof of Claim No. 236	61 \$11,101.85	62 Untimely. Claim 63 filed on July 2, 64 2018.

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1	Claimant	Basis for Claim	Amount of Claim	Basis for Objection
2	Mansour, Mouhamad	Proof of Claim No. 171	Unknown	This claim has been satisfied during the course of this case.
3	Mansour, Mouhamad	Proof of Claim No. 177	Unknown	This claim has been satisfied during the course of this case. Additionally, it duplicates Proof of Claim No. 171.
4	Orthofix Inc.	Proof of Claim No. 231	\$3,800.00	Untimely. Claim filed on April 17, 2018.
5	PSS Urology, Inc.	Proof of Claim No. 241	\$17,496.39	Untimely. Claim filed on September 4, 2018.
6	SEIU 1199NW Healthcare	Proof of Claim No. 216	Unknown	This claim has been satisfied during the course of this case.
7	Tryon Clear View Group, LLC	Proof of Claim No. 230	\$36,614.00	Untimely. Claim filed on February 8, 2018. Further, there are no documents to support the claimed amount.
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18 Therefore, the Trustee objects to the Claims listed above and requests
 19 disallowance of the same.

20 DATED this 30th day of January, 2019.

21 BUSH KORNFELD LLP

22 By /s/ Thomas A. Buford
 23 Thomas A. Buford, WSBA #52969
 James L. Day, WSBA #20474

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Attorneys for Narendra Ganti, Trust
Administrator of the Kennewick
Liquidation Trust

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